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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

This Document Relates to:

ALL ACTIONS

**JOINT STIPULATION AND
ORDER PERMITTING
INDIVIDUALS AND ENTITIES THAT
PREVIOUSLY OPTED OUT OF THE
CLASS TO OPT BACK INTO THE
CLASS**

1 Pursuant to this Court's Minute Order, dated September 15, 2022 (ECF No. 168), Lead
2 Plaintiff Rick Keiner ("Lead Plaintiff,") and Defendants Lyft, Inc., Logan Green, John Zimmer,
3 Brian Roberts, Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi
4 Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter ("Defendants," and together with Lead
5 Plaintiff the "Parties"), through their counsel, submit the following Joint Stipulation and
6 [Proposed] Order Permitting Individuals and Entities That Previously Opted Out of the Class to
7 Opt Back Into the Class (the "Joint Stipulation").

8 WHEREAS, on June 16, 2022, Lead Plaintiff filed his Notice of Motion, Unopposed
9 Motion for Preliminary Approval of Settlement, and Memorandum of Points and Authorities in
10 Support Thereof (the "Motion") (ECF No. 249);

11 WHEREAS, accompanying the Motion was the Parties' Stipulation and Agreement of
12 Class Action Settlement (the "Settlement Stipulation") (ECF No. 249-2) and supporting exhibits;

13 WHEREAS, individuals who previously opted-out of the class (the "Proposed
14 Intervenor") have sought to intervene in opposition to the Motion (ECF No. 257);

15 WHEREAS, the Court held a hearing on the Motion on September 15, 2022 (the
16 "Hearing");

17 WHEREAS, counsel for the Parties met and conferred along with counsel for the
18 Proposed Intervenor following the Hearing on September 15, 2022, and the Parties have agreed
19 to amend the Settlement Stipulation and certain supporting exhibits (including to change the
20 language of the release) to permit parties that have previously opted-out of the Class to opt back
21 into the class, preserving their right to object to the settlement at final approval;

22 WHEREAS, the Parties have executed a Revised Stipulation and Agreement of Class
23 Action Settlement (the "Revised Settlement Stipulation") and have edited the release and the
24 supporting exhibits to expressly permit individuals who previously opted out of the Class to opt
25 back into the Class;

26 WHEREAS, on September 27, 2022, Lead Plaintiff will file revised versions of the
27
28

Stipulation of Settlement and exhibits reflecting the changes described herein.

NOW, THEREFORE, the Parties hereby stipulate, subject to Court approval, that individuals who previously opted out of the Class be allowed to opt back into the Class, pursuant to the Revised Settlement Stipulation and its supporting exhibits, to be filed concurrently with Lead Plaintiffs' Renewed Motion.

Stipulated and agreed to by:

Date: September 27, 2022

BLOCK & LEVITON LLP

/s/ Jeffrey C. Block

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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: September 27, 2022

/s/ Jeffrey C. Block
Jeffrey C. Block

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 9/28/2022


HONORABLE HAYWOOD S. GILLIAM, JR.
U.S. DISTRICT JUDGE